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March 7, 2022

VIA ECF

The Honorable Denise L. Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, Case No. 1:20-cv-706 (DLC)

Dear Judge Cote:

On behalf of Martin Shkreli, I hereby respectfully request permission to file under seal portions of Mr. Shkreli's Memorandum of Law in Support of Motion to Stay Execution of Monetary Judgment Pending Appeal (the "Memorandum") and Mr. Shkreli's March 5, 2022 Declaration (the "Declaration").

Pursuant to the Court's September 17, 2020 Order (ECF No. 261), I respectfully provide the Court with the reason for the requested redactions in the Memorandum and Declaration. Mr. Shkreli seeks to file portions of the Memorandum and the Declaration under seal because the requested redactions contain personal and confidential information pertaining to Mr. Shkreli's finances that is not related to the claims or defenses in this case and has not been released into the public domain. The sealing of this information is necessary to preserve the higher values of protecting personal confidential information of Mr. Shkreli, and thus, sealing the portions of the Memorandum and Declaration is narrowly tailored to achieve the aim of preserving such higher values. In accordance with Rule 8.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Mr. Shkreli will publicly file redacted versions of the Memorandum and the Declaration, and on a separate docket entry, Mr. Shkreli will file under seal the unredacted Memorandum and Declaration.

Respectfully submitted,

/s/ Christopher H. Casey
Christopher H. Casey

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Granted.
J. Morris
3/8/22